



# Monsanto

Monsanto Company  
Sauget, Illinois 62201  
Phone: (618) 271-5835

June 3, 1971

Illinois Pollution Control Board  
189 West Madison Street  
Chicago, Illinois

Re: Environmental Protection Agency vs.  
Sauget & Company - #71-29

Dear Sir:

Order number 8 of the reference Opinion and Order of the Board states in part, "On or before June 15, 1971, Sauget & Company and Paul Sauget shall file with the Agency and the Board a list of chemical compounds being deposited in the liquid waste disposal facility, or an affidavit of Monsanto Company that the chemicals do not pose a threat of pollution of the Mississippi River by underground seepage."

In the body of the reference memo we note in Page 4, Paragraph 5 the statement, "The Agency complains that Sauget & Company had disposed of liquids and hazardous materials without prior approval." Also, reading the total paragraph indicates the Agency witnesses had limited information about the nature of the chemical wastes.

We recognize that with the recent re-organization of the Agency and usual change in personnel in recent years much correspondence is probably not readily available to the Agency people. We submit copies (attached) of the August 7, 1968 correspondence from C. W. Klassen of the Sanitary Water Board and our reply of August 16, 1968 which lists the chemical compounds being deposited in the liquid waste disposal facility. It is my understanding that this listing satisfactorily answered all questions the State had about the compounds involved.

008641

June 3, 1971

At present we continue to deposit wastes of the same general composition as described in our August 16, 1968 letter. There has been a significant reduction of about 48% in the total quantity involved. In 1968 we deposited at the appropriate rate of about 35,470 cubic yards per year. In the year 1971 we estimate this will be about 18,400 cubic yards. Most of this reduction reflects the termination of certain major production operations at our Plant; such as, our Phenol Plant, the Alkyl Benzene Department and the sale of our "North Area Plant" - the oil additive production facilities - to Edwin Cooper, Incorporated.

We also note that the liquid waste disposal area has five operational test wells at strategic perimeter locations. These are periodically sampled and analyzed for phenol and COD. In the past, samples from these monitoring wells have been picked up by the Illinois Sanitary Water Board upon their request. Our most recent sampling analysis of April 29, 1971 indicated no measurable COD in any of the five test wells and no measurable phenol in four of the wells. One test well analyzed 2 ppm phenol. The previous sample in that well was 1 ppm of phenol. We interpret these data to indicate that no environmental problem exists.

Please advise if we can be of any further service in this matter.

Sincerely yours,



P. E. Heisler, Director of  
Environmental Control

/jhe

Att.

000612

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## SANITARY WATER BOARD

SPRINGFIELD

August 7, 1968

TECHNICAL SECRETARY  
CLARENCE W. KLASSEN  
CHIEF SANITARY ENGINEER  
DEPARTMENT OF PUBLIC HEALTH

ADDRESS LETTERS TO  
STATE SANITARY WATER BOARD  
SPRINGFIELD, ILLINOIS  
62706

MONSANTO - Solids Waste Disposal  
(Sauget Disposal Area)

Mr. John R. McClain  
Plant Manager  
Monsanto Company  
Sauget, Illinois

Dear Mr. McClain:

We received your letter of August 1, 1968 concerning the deposition of waste in your industrial disposal site at Sauget.

Our request as to the types and amounts of materials deposited in this area resulted from the need to determine possible pollutional discharges. While it is reasonably easy to determine the phenol content and COD of any losses, it is obvious that this does not necessarily indicate retention or loss of other contaminants. We are both well aware that a large quantity of organic wastes are disposed of in this area. Many of these wastes do not lend themselves to easy analysis nor are we fully cognizant of the numerous reaction products which may result from intimate contact of the various wastes. It is our hope that by having some idea of the amounts and composition of the wastes, we may arrive at a minimal number of analyses which may be performed in order to monitor any possible loss of contaminants from this area. Should you find it objectionable to divulge this information it may be possible to monitor this site by means of some persistent tracer such as dye or chlorides, etc.

The other alternative to continuous monitoring and surveillance of this site is the possibility of incineration of all wastes to a final stable state. Should monitoring prove impractical or should it demonstrate losses of pollutional material, the discontinued use of this site with the possible alternative of total destruction by incineration or some other means may be necessitated.

Very truly yours,



C. W. Klassen  
Technical Secretary

ECB:cj

cc: -General Sanitation  
-Region VI

0-5843

# Monsanto

C O M P A N Y

Seuget, Illinois 62201  
(619) 271-5835

August 16, 1968

Mr. C. W. Klassen  
Technical Secretary  
State of Illinois Sanitary Water Board  
Springfield, Illinois 62706

Dear Mr. Klassen:

In reply to your letter of August 7, 1968, I have the following information which you need to set up a monitoring program for our industrial waste disposal site.

In general we deposit at this site those wastes which would add to the sludge load at the waste treatment plant or would dissolve in our wastewater and add to the phenol content, C.O.D. or color of the final effluent. Chemically, they fall into 6 main groups:

1. Phenols
2. Aromatic Nitro Compounds
3. Aromatic Amines and Nitro Amines (highly colored)
4. Chlorinated aromatic hydrocarbons
5. Aromatic and aliphatic Carboxylic acids
6. Condensation or reaction products of the above

A more detailed list of sources and quantities follows:

1. Still Residues - tars, condensation and decomposition products of doubtful composition but with some of the primary product remaining.

From the Distillation of:

Approx. Annual Amount

a. Phenol	1,020 Cu. yds.
b. Chlorophenol	720 Cu. yds.
c. Nitro-Aniline and similar compounds	1,700 Cu. yds.
d. Chlorobenzol (Tri-Tetrachlor)	130 Cu. yds.
e. Chloro aniline	1,100 Cu. yds.
f. Other aniline derivatives	200 Cu. yds.
g. Nitro benzene derivatives	100 Cu. yds.
h. Aromatic carboxylic acids (Maleic, Phthalic, etc.)	1,500 Cu. yds.
i. Chlorophenol Ether	350 Cu. yds.

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## 2. By-Products -

a. Mixed isomers of nitrochlorobenzene	1,700 Cu. yds.
"          "          " Dichlorophenol	3,000 Cu. yds.
b. Waste Maleic Anhydride	730 Cu. yds.
c. Waste Chlorobenzenes and Nitro-chlorobenzenes	120 Cu. yds.

## 3. Contaminated Water and Acids -

a. Water with varying amounts of phenols (0-15%)	7,200 Cu. yds.
b. Waste Sulfuric acid with chlorophenol present	1,500 Cu. yds.
c. Caustic Soda Solution with chlorophenol present	5,300 Cu. yds.

## 4. Waste Solvents -

a. Waste Methanol contaminated with Mercaptans	600 Cu. yds.
b. Waste Isopropanol -- Water and chlorinated hydrocarbon	5,500 Cu. yds.
c. Research Waste: Miscellaneous Solvents and Materials	1,019 Cu. yds.
d. Oily Materials from Oil Additive Production	101 Cu. yds.

## 5. Filter Sludge -

a. Attapulugus Earth -Keisulguhr from Alkyl Benzene filtration	600 Cu. yds.
b. Lime Mud from nitro-aniline production..	1,000 Cu. yds.

## 6. Unwanted Samples and Waste resulting from taking samples -

a. Chlorophenols	72 Cu. yds.
b. Laboratory Samples (Everything)	208 Cu. yds.

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August 16, 1968

7. Miscellaneous Wastes -

These consist of spoiled material, floor sweepings, sludge from cleaning equipment and storage tanks etc which would cause problems if sewered. They are mostly reaction products of the above materials eg Esters of phenols or aliphatic alcohols with carboxylic acids such as phthallic, Maleic, or Benzoic acid, Anilides, Sulphonated phenols or other aromatics.

The relative quantities of these materials will necessarily vary according to sales of particular products and there will be additions to and deletions from this list. However, the general chemical classification will remain much the same.

Please let me know if you need any additional information.

Very truly yours,

J. R. McClain  
Plant Manager

jo.

003616

## SAUGET SITES ACCESS AGREEMENT REPORT - 3/13/87 (Grouped by Sites)

COPY

Site Designation	Owner of Record	Taxpayer of Record	Tax Parcel Number	First Access Agreement Sent	Response Date	Second Access Agreement Sent	Response Date	Comments	Signature Date of Access Agreement
	Rogers Cartage		1-26-409-1	03-Dec-86	12-Jan-87				08-Jan-87
8	Moto, Inc. ✓		1-26-401-7	02-Jan-86	08-Jan-86	16-Dec-86	12-Jan-87	Renewal of 1/7/86 agreement	09-Jan-87
6	Moto, Inc. ✓		1-26-401-8	02-Jan-86	08-Jan-86	16-Dec-86	12-Jan-87	Renewal of 1/7/86 agreement	09-Jan-87
6	Moto, Inc. ✓		1-26-401-9	02-Jan-86	08-Jan-86	16-Dec-86	12-Jan-87	Renewal of 1/7/86 agreement	09-Jan-87
6	Cronin, James P. & Shirley M. □		1-26-401-1	31-Mar-86				E&E dropped access request for this parcel	
6	Wiese, Harold W.		1-26-401-3	02-Jan-86	08-Jan-86		13-Jan-87	Renewal of 1/8/86 agreement	10-Jan-87
6	Wiese, Harold W.		1-26-401-4	02-Jan-86	08-Jan-86		13-Jan-87	Renewal of 1/8/86 agreement	10-Jan-87
6	Mid America Bank and Trust ✓		1-26-401-2	31-Mar-86	23-Apr-86				22-Apr-86
6	Hankins, Andrew ✓		1-26-401-10	31-Mar-86	10-Apr-86				08-Apr-86
6	Hankins, Myrtle		1-26-401-11	31-Mar-86		27-Jun-86			
6	Hankins, Emily □		1-26-401-6	31-Mar-86		27-Jun-86		Verbally refused access	
6	Wise Planning & Engineering □		1-26-401-13	31-Mar-86				E&E dropped access request for this parcel	
6	Cerro Corp. ✓		1-26-400-14	02-Jan-86	15-Apr-86	01-May-86	18-Jul-86	Further info sent 2/24/86-Attny revised A.A.	04-Nov-86
6	Minewald, Inc. ✓		1-35-101-2	31-Mar-86	29-May-86				26-May-86
6	Minewald, Inc. ✓		1-35-101-3	31-Mar-86	29-May-86				26-May-86
6	Minewald, Inc. ✓		1-35-101-7	31-Mar-86	29-May-86				26-May-86
6	Penrock, William S. & Barbara E. ✓		1-35-101-4	31-Mar-86		27-Jun-86	04-Aug-86		01-Aug-86
6	Industrial Bases, Inc. ✓		1-35-101-6	31-Mar-86	29-May-86				24-May-86
6	Village of Sauget		1-26-400-15	02-Jan-86	13-Jan-86	09-Apr-86		Village denies ownership-E&E will check	
H	Tolbird, James D. & Doris M.		1-26-402-13	02-Jan-86	09-Jan-86				09-Jan-86
I	Cerro Corp.	P.O. Box 681, E. St. Louis	1-26-400-12	15-Apr-86	15-Apr-86	01-May-86	18-Jul-86	Further info sent 2/24/86-Attny revised A.A.	04-Nov-86
I	Cerro Corp.		1-26-402-12	15-Apr-86	15-Apr-86	01-May-86	18-Jul-86	Further info sent 2/24/86-Attny revised A.A.	04-Nov-86
I	Village of Monsanto (Sauget)		1-26-402-15	02-Jan-86	13-Jan-86	31-Mar-86	01-May-86	Further A.A. sent 4/9/86; Corresp. 7/2/86	26-Jan-87
I	Village of Sauget		1-26-400-10	02-Jan-86	13-Jan-86	09-Apr-86	01-May-86	Village says it lacks ingress/egress rights	26-Jan-87
I	Village of Sauget		2-21-402-16	02-Jan-86	13-Jan-86	09-Apr-86	01-May-86	Village denies ownership-E&E will check	
J	Sterling Steel Foundry, Inc.		1-26-204-1	31-Mar-86				Access verbally approved-4/28/86	N/A
J	Sterling Steel Foundry, Inc.	Peper, Christian	1-26-403-1	31-Mar-86				Access verbally approved-4/28/86	N/A
J	Sterling Steel Foundry, Inc.		1-26-403-2	31-Mar-86				Access verbally approved-4/28/86	N/A
K	Sauget, Paul &/or et al.		1-26-405-8	09-Apr-86	01-May-86	22-May-86		Signed by Trustee Y. Sauget: Expires 2/15/87	17-Nov-86
K	Sauget, Paul &/or et al.		2-26-406-1	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-2	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-3	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-4	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-5	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-6	09-Apr-86		22-May-86		E&E: could defer access; Access refused-5/30/86	N/A
K	Sauget, Paul &/or et al.		2-26-406-14	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-15	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-21	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-22	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Sauget, Paul &/or et al.		2-26-406-23	09-Apr-86		22-May-86		E&E: access could be deferred	
K	Village of Monsanto (Sauget)		1-26-405-2	02-Jan-86	13-Jan-86	31-Mar-86	01-May-86	Further A.A. sent 4/9/86; Corresp. 7/2/86	26-Jan-87
K	Village of Sauget		1-26-405-3	02-Jan-86	13-Jan-86	09-Apr-86	01-May-86	Corresp. 7/2/86	26-Jan-87
K	Village of Sauget		1-26-405-4	02-Jan-86	13-Jan-86	09-Apr-86	01-May-86	Corresp. 7/2/86	26-Jan-87
K	Graves, William D. & Cindy L.		2-26-406-7	31-Mar-86				Involves soil sampling only	
K	Russell, Gertrude		2-26-406-8	31-Mar-86				Involves soil sampling only	
K	Cleveland, David E.		2-26-406-9	31-Mar-86	28-May-86			Involves soil sampling only	28-May-86
K	O'Bell, Loretta E.		2-26-406-10	31-Mar-86	28-May-86			Involves soil sampling only	28-May-86
K	Adels, Homer C. & Eva D.		2-26-406-11	31-Mar-86				Involves soil sampling only; P. Sauget's nephew	
K	Tolbird, J. D. & Doris		2-26-406-12	31-Mar-86	08-Apr-86			Involves soil sampling only	07-Apr-86
K	Sadowski, Mary V.		2-26-406-13	31-Mar-86	28-May-86			Involves soil sampling only	28-May-86
K	Germania, F. A.		2-26-406-16	31-Mar-86	09-Apr-86			Signed by Bere Rich & Vela Osborn	07-Apr-86
K	Ogden, Marvin D. & Boneva		2-26-406-17	31-Mar-86				Involves soil sampling only; Sauget Fire Chief	

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